

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS
IGOIN, LAURENCE APFELBAUM,
individually and in her capacities as executor
and beneficiary of the Estate (Succession) of
Doris Igoi, and EMILIE APFELBAUM,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04336 (SMB)

**DECLARATION OF JONATHAN K. COOPERMAN IN FURTHER SUPPORT
OF DEFENDANTS THE ESTATE (SUCCESSION) OF DORIS IGOIN,
LAURENCE APFELBAUM, AND EMILIE APFELBAUM'S
MOTION TO DISMISS BASED ON JURISDICTIONAL DISCOVERY**

Pursuant to 28 U.S.C. § 1746, Jonathan K. Cooperman declares as follows:

1. I am an attorney admitted to practice in the State of New York and the United States District Court for the Southern District of New York, and a member of the firm of Kelley Drye & Warren LLP, counsel to Defendants The Estate (Succession) of Doris Igoi, Laurence Apfelbaum, individually and in her capacities as executor and beneficiary of the Estate

(Succession) of Doris Igoïn, and Emilie Apfelbaum (collectively, “Defendants”) in the above-captioned action. I submit this declaration in further support of Defendants’ Motion to Dismiss Based on Jurisdictional Discovery and to put before the Court deposition testimony cited in Defendants’ supporting Jurisdictional Memorandum of Law.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition of Laurence Apfelbaum, taken in Paris, France on March 26-27, 2014.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of Kurt Brunner, taken in the case *Picard v. Magnify, Inc., et al.*, Adv. Pro. No. 10-05279(SMB) (S.D.N.Y. Bankr.), in London, England on November 7-8, 2012. Exhibit 2 is the subject of a motion to file under seal.

4. I certify under penalty of perjury that the foregoing is true and correct.

Dated: June 20, 2014
New York, New York

s/ Jonathan K. Cooperman
Jonathan K. Cooperman